

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al

Debtors

PROMESA Title III

No. 17 BK 3283-LTS

(Jointly administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO SALES TAX FINANCING
CORPORATION

Debtor

PROMESA Title III

No. 17 BK 3284-LTS

NOTICE OF APPEAL¹

¹The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID_ 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS)(Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

TO THE HONORABLE COURT

Come now, the parties identified below, who respectfully state, pray, and request as follows:

I. The appearing parties:

The parties who appear through this objection are the following:

a) René Pinto Lugo; VAMOS, Movimiento de Concertación Ciudadana Inc., (VAMOS); and the following labor unions: Unión de Empleados de Oficina y Profesionales de la Autoridad de Edificios Públicos, (UEOGAEP); Unión Insular de Trabajadores Industriales y Construcciones Eléctricas Inc., (UITICE); Unión Independiente de Empleados de la Autoridad de Acueductos y Alcantarillados (UIA); Unión de Empleados de Oficina Comercio y Ramas Anexas, Puertos, (UEOCRA); Unión de Empleados Profesionales Independientes, (UEPI); Unión Nacional de Educadores y Trabajadores de la Educación, (UNETE); y la Asociación de Inspectores de Juegos de Azar, (AIJA). These parties are Plaintiffs in adversary case 18-AP-0041 (LTS) before this Court; and

b) Manuel Natal-Albelo who is a legislator and a member of the House of Representatives of the Commonwealth of Puerto Rico.

II. The Court's determination subject to the Notice of Appeal

Notice is hereby given that the appearing parties hereby appeal to the United States Court of Appeals for the First Circuit from the Order and Judgment Confirming the Third Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation issued by the District Court in the cases referred to herein, that is Cases Number 17 BK 3283 - LTS and Number 17 BK 3284-LTS jointly administered, on February 4, 2019, as amended on February 5, 2019, Docket numbers 5048 and 5055 and in the COFINA case 559 and 561, the Memorandum of Finding of Facts and

Conclusions of Law in Connection with Confirmation of the Third Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation dated February 4, 2019 as amended on February 5, 2019, Docket 5047 and 5053, and in the COFINA case 558 and 560. A copy of the *Order and Judgment as amended* is attached as Exhibit A and of the amended Memorandum of Findings of Fact .. is attached as Exhibit B.

The parties to the final judgment appealed from, and the names and address of their respective attorneys are as follows:

1) As far as the Appellants are concerned, the ones referred to above and the attorney of record is the undersigned.

2) As far as the Appellees are concerned:

a) Financial Oversight and Management Board for Puerto and Individual Defendants

O'NEILL & BORGES LLC

Hermann D. Bauer

Ubaldo M. Fernández

250 Muñoz Rivera Ave., Suite 800

San Juan, PR 00918-1813

PROSKAUER ROSE LLP

Martin J. Bienenstock

Eleven Times Square

New York, NY 10036

b) Puerto Rico Fiscal Agency and Financial Advisory Authority

Mohammad S. Yassin

Robert Sánchez Vilella (Minillas)

Government Center

De Diego Avenue, Stop 22

San Juan, Puerto Rico 00907

O'MELVENY & MYERS LLP

John Rapisardi

Suzanne Uhland

William J. Sushon

7 Times Square

New York, New York 10036

and

M. Randall Oppenheimer

1999 Avenue of the Stars 8th Floor

Los Angeles, California 90067-6035

and

Walter Dellinger

Peter Friedman

1625 Eye Street, NW

Washington, D.C. 20006

c) Commonwealth Agent

PAUL HASTINGS LLP

Luc. A. Despins, Esq. (Pro Hac Vice)

Andrew V. Tenzer, Esq. (Pro Hac Vice)

Michael E. Comerford, Esq. (Pro Hac Vice)

G. Alexander Bongartz, Esq. (Pro Hac Vice)

200 Park Avenue

New York, New York 10166

and

CASILLAS, SANTIAGO & TORRES LLC

Juan J. Casillas Ayala, Esq., USDC - PR 218312

Diana M. Batlle-Barasorda, Esq., USDC - PR 213103

Alberto J. E. Añeses Negrón, Esq., USDC - PR 302710

Ericka C. Montull-Novoa, Esq., USDC - PR 230601

El Caribe Office Building

53 Palmeras Street, Ste. 1601

San Juan, Puerto Rico 00901-2419

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 18th day of February, 2019.

I hereby certify that on this same day a true and exact copy of this Notice of Appeal was filed through the CM/ECF Systems of this case, which will send notification of such filing to all participants, interested, and Standard Parties.

S/ROBERTO O. MALDONADO NIEVES
ROBERTO O. MALDONADO NIEVES
U.S. Id. 202209
C/7 N.E. #344, Suite 1-A
Esq. Franklin D. Roosevelt
San Juan, Puerto Rico 00921
Tel.: 782-3221 // 792-5622/ Fax 273-7250
E-mail: romn1960@gmail.com